

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX Trading Ltd., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing date: January 20, 2023 at 10:00 a.m.

**DECLARATION OF RICHARD L. BRUMMOND IN SUPPORT OF  
JOINDER IN AMENDED OBJECTION TO DEBTORS' APPLICATION  
FOR AN ORDER AUTHORIZING THE RETENTION AND  
EMPLOYMENT OF SULLIVAN & CROMWELL LLP AS COUNSEL TO  
THE DEBTORS AND DEBTORS-IN-POSSESSION *NUNC PRO TUNC*  
TO THE PETITION DATE**

I, Richard L. Brummond, under penalty of perjury, declare as follows:

1. I am a natural-born citizen of the United States and a resident of Sacramento, California. I am over the age of 18 and am competent to make this Declaration.

2. I submit this Declaration in support of my joinder in Warren Winter's *Amended Objection to Debtors' Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell, LLP as Counsel to the Debtors and*

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

*Debtors-in-Possession Nunc Pro Tunc to the Petition Date* (Dkt. 459). Except where otherwise noted, I have personal knowledge of the facts stated herein.

3. Over the last several months, I have compiled documentation concerning my FTX US deposit history, consisting of monthly bank statements and screenshots of details from my FTX US account. That documentation is attached to this Declaration and described in detail below. I make the statements herein to the best of my recollection and based on my review of the documentation I collected.

#### **I. Documentary Evidence**

4. True and correct copies of my U.S. Bank N.A. checking account monthly statements, showing my U.S. Dollar transfers to FTX US, are attached to this Declaration as Exhibit 1. I personally downloaded these monthly statements from the U.S. Bank website on November 19, 2022. These monthly statements are for my personal checking account, Account Number x-xxx-xxxx-4952. They show that I transferred to FTX US a total of \$30,090.00 on the following dates:

	<b>Date</b>	<b>U.S. Dollars Transferred to FTX US</b>
1	08/26/2021	\$100.00
2	09/16/2021	\$100.00
3	09/27/2021	\$100.00
4	10/01/2021	\$100.00
5	10/25/2021	\$100.00
6	10/28/2021	\$100.00
7	11/03/2021	\$100.00
8	11/09/2021	\$3,000.00
9	11/10/2021	\$1,000.00
10	11/12/2021	\$100.00
11	11/12/2021	\$20,000.00
12	11/18/2021	\$100.00
13	11/19/2021	\$3,000.00
14	12/09/2021	\$100.00
15	12/20/2021	\$100.00
16	12/23/2021	\$100.00

	<b>Date</b>	<b>U.S. Dollars Transferred to FTX US</b>
17	01/06/2022	\$50.00
18	01/13/2022	\$50.00
19	01/20/2022	\$50.50
20	01/27/2022	\$50.50
21	02/04/2022	\$50.00
22	02/10/2022	\$50.50
23	02/17/2022	\$50.00
24	02/24/2022	\$50.00
25	03/03/2022	\$50.50
26	03/11/2022	\$50.00
27	03/17/2022	\$50.50
28	03/24/2022	\$50.00
29	03/31/2022	\$50.00
30	04/14/2022	\$25.00
31	04/14/2022	\$25.00
32	04/22/2022	\$35.00
33	04/28/2022	\$50.50
34	05/04/2022	\$50.00
35	05/10/2022	\$100.00
36	05/19/2022	\$50.00
37	06/03/2022	\$50.00
38	06/09/2022	\$50.00
39	06/27/2022	\$50.00
40	06/30/2022	\$50.50
41	07/08/2022	\$50.00
42	07/15/2022	\$50.00
43	07/25/2022	\$50.00
44	07/28/2022	\$50.50
45	08/04/2022	\$50.00
46	08/18/2022	\$50.00
47	08/25/2022	\$50.50
48	09/01/2022	\$50.00
49	10/04/2022	\$50.00
50	10/13/2022	\$50.00
51	10/20/2022	\$50.00
52	10/28/2022	\$50.00
53	11/03/2022	\$50.50

	<b>Date</b>	<b>U.S. Dollars Transferred to FTX US</b>
54	11/09/2022	\$50.00
	<b>Total</b>	<b>\$ 30,090.00</b>

5. A true and correct copy of a screenshot of my FTX US “Linked banks & cards” page, showing that my U.S. Bank personal checking account, Account Number ending in 4952, is linked to my FTX US account, is attached to this Declaration as Exhibit 2. I personally captured this screenshot on January 14, 2023, using standard screen-capture technology.

6. True and correct copies of screenshots showing U.S. Dollars and cryptocurrency in my FTX “Wallet” are attached to this Declaration as Exhibit 3. I personally captured these screenshots of my FTX US Wallet on the FTX US app on November 15 and 18, 2022. These screenshots show the following U.S. Dollar and cryptocurrency funds in my FTX US “Wallet” as of November 15, 2022:

<b>Currency</b>	<b>Amount</b>
U.S. Dollar	\$0.09340868
Bitcoin	0.34055962 BTC
Ethereum	2.8028 ETH
Solana	42.2237 SOL
Aave	0.64025157 AAVE
Dogecoin	477.4597 DOGE
Shiba Inu	959,410 SHIB
Ethereum (Proof of Work)	2.7633 ETHW
TRON	15 TRX
Compound Tether	29 CUSDT
Brazilian Digital Token	3 BRZ

7. True and correct copies of screenshots of my FTX US account Bitcoin deposit history are attached to this Declaration as Exhibit 4. I personally captured these screenshots on November 15, 2022, using standard screen-capture technology. These screenshots indicate that in addition to buying cryptocurrency with U.S.

Dollars on the exchange, I also deposited Bitcoin in the following amounts in my FTX US account:<sup>2</sup>

<b>Date</b>	<b>Bitcoin Amount</b>
11/14/2021	0.001 BTC
11/14/2021	0.01061898 BTC
11/23/2021	0.00174031 BTC
11/23/2021	0.00013452 BTC
11/24/2021	0.05692537 BTC
02/09/2022	0.00267085 BTC
<b>Total</b>	<b>0.07309003 BTC</b>

## **II. FTX Relationship Timeline**

8. I do not recall the exact date I created my FTX US account and have been unable to locate any account-creation documentation. My checking account statements and screenshots of my FTX US account deposit history, attached to this Declaration as Exhibits 1 and 4, respectively, show that I made my first transfer of funds to my FTX US account on August 26, 2021. To the best of my recollection, I created my FTX US account shortly before this initial transaction.

9. When I created my FTX US account, I completed the required Know-Your-Customer process by providing my California driver's license and accurate biographical information.

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<sup>2</sup> In addition to these Bitcoin deposits, I also deposited Ethereum and Dogecoin in my FTX US account, but in the process of collecting evidence concerning my FTX US account, I discovered that records of these deposits do not appear in my FTX US app. Because the FTX.us website is no longer accessible, I do not have access to this deposit history.

10. In the process of collecting evidence concerning my FTX US account, I was unable to identify my FTX US account number from the FTX mobile app. Because the FTX.us website is no longer accessible, I no longer have access to that information.

11. As reflected in the transaction-history documents attached to this Declaration, I transferred tens of thousands of U.S. Dollars and a significant amount of Bitcoin into FTX from August 2021 to November 2022.

12. On November 15, 2022, my FTX US “Wallet” indicated that I held assets with FTX US valued at \$10,100.79, including assets valued at \$616.25 that I “earned” on the platform. On November 22, 2022, I submitted withdrawal requests for my FTX US-held Bitcoin, Ethereum, Solana, and Dogecoin. I have not received any of those assets.

13. If called upon to testify, I will testify competently to the facts set out in this Declaration.

14. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 16, 2023

/s/ **Richard L. Brummond**

Mr. Richard L. Brummond  
Declarant